

1 DAVID BURCHARD,
2 CHAPTER 13 TRUSTEE
3 PO BOX 8059
4 FOSTER CITY, CA 94404
5 Tel: (650) 345-7801 Fax: (650) 345-1514
6 Tel: (707) 544-5500 Fax: (707) 544-0475
7

8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In re)	Case No.: 19-10074 DM
ANA KAREN ESQUIVEL DE VELEZ)	TRUSTEE'S OBJECTION TO DEBTOR'S
Debtor.)	MOTION TO MODIFY CHAPTER 13
)	PLAN
)	
)	

TO THE UNITED STATES BANKRUPTCY JUDGE, DEBTOR(S)' COUNSEL,
DEBTOR(S), AND OTHER PARTIES IN INTEREST:

David Burchard, Chapter 13 Trustee ("Trustee"), for the Santa Rosa and San Francisco Divisions of the United States Bankruptcy Court for the Northern District of California, hereby submits the following Objection to the Motion to Modify Chapter 13 Plan proposed by Debtor(s), filed on July 27, 2020. This objection is based upon all pleadings, papers and documents filed herein, together with those matters of which judicial notice has been requested, and any oral argument, which may be presented.

///
///
///

1 The Trustee is unable to verify the basis for the motion to modify and Debtor's
2 substantial change in income and/or expenses without Debtor providing the following
3 information:

4
5 ☐ Updated Schedules I and J, utilizing the schedules effective December 2015.

6 ☒ A signed copy of the debtor's filed 2019 Federal Income Tax Return

7 ☐ Verification of income to substantiate change in plan payments in the form of
8 payment advices for the last 60 days. If the debtor does not receive payment
9 advices, the Trustee requests copies of bank statements for the last 2 months from
10 all bank accounts in which debtor is a signatory.

11 ☐ Other:
12

13 Therefore, the Trustee requests that this objection be sustained, Debtor's Application to
14 Modify Chapter 13 Plan be denied, and other relief this Court deems proper.
15

16 Dated: August 12, 2020

/s/ David Burchard

DAVID BURCHARD

CHAPTER 13 TRUSTEE
17
18
19
20
21
22
23
24
25
26
27
28

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

ANA KAREN ESQUIVEL DE VELEZ
2653 MONUMENT DR
SANTA ROSA, CA 95407

EVAN LIVINGSTONE
evanmlivingstone@gmail.com

LIZ WHIGHAM

LIZ WHIGHAM